

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

Vanessa Allen-Brown : Case No. C-02-489  
Plaintiff, : JOINT STATUS REPORT  
vs. :  
Schrudde & Zimmerman, Inc. :  
Defendant. :

The parties, by and through their undersigned counsel, hereby submit the following joint status report in accordance with the Court's Amended Scheduling Order.

- (1) The parties have been actively engaged in discovery. Depositions of Plaintiff and some representatives of the University of Cincinnati have been taken. A couple of the representatives of the University of Cincinnati failed to show up for deposition despite counsels' compliance with the instructions of the attorney representing the University of Cincinnati. One of those who failed to show up still remains to be deposed. In addition, the parties have been advised by the attorney for the University of Cincinnati that copies of the documentation pertaining to the construction project upon which Defendant was the general contractor must be specified in writing before such will be provided to the parties. Therefore, requests are being prepared to submit to the University of Cincinnati. Additionally, Defendant still owes Plaintiff responses to her written discovery and its representatives have still not been deposed as a result. Plaintiff intends to depose Defendant's representatives with knowledge as soon as practical after receipt of Defendant's responses to Plaintiff's written discovery. In light of the above situation,

counsel for the parties have agreed to informally extend the discovery cut-off date to accomplish the above.

- (2) Because of the current state of discovery as described above, Defendant has still not yet determined whether it shall file a Civil Rule 56 motion. Defendant reserves the right to revise this in the event that it believes such a motion is appropriate based upon the facts developed during discovery.
- (3) Plaintiff has submitted a settlement proposal to Defendant and is awaiting a response thereto.

Respectfully submitted,

S/Michael B. Ganson  
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been served upon opposing counsel by electronic delivery via the CM/ECF system this 7<sup>th</sup> day of November, 2003.

S/Michael B. Ganson  
Michael B. Ganson, Esq.  
Michael B. Ganson Co., L.P.A.  
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